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1 States Government

Department of Energy

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Memorandum

Rocky Flats Of

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DIST. LTR ENC

MAY 08 1992

EC&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

AMEM:JKH

Rocky Flats Comprehensive Treatment and Management Plan (CTMP)

Leo P. Duffy, Assistant Secretary for Environmental Restoration and
Waste Management EM-1, HQ

The purpose of this memorandum is to make you aware of recent findings during my review of the Rocky Flats Comprehensive Treatment and Management Plan (CTMP).

The CTMP is a required deliverable under the Rocky Flats Federal Facilities Compliance Agreement (FFCA II) for Land Disposal Restricted (LDR) waste. Under the terms of the FFCA, it must be delivered to EPA Region VIII by June 10, 1992. New treatment technologies which will be required to treat the Rocky Flats LDR waste must be identified. The CTMP must contain milestones, enforceable under the terms of the FFCA, for each new technology.

The preliminary cost and schedule information supporting the technologies identified to treat the Rocky Flats LDR waste predict that it may take more than 30 years and more than \$2 billion to fully implement the CTMP at Rocky Flats. This is not the best commitment for DOE to make under an enforceable agreement. These estimates are based on an assumption that it may not be possible to ship waste to other sites and that all treatment would be done on-site at Rocky Flats.

A joint HQ/Rocky Flats review should be conducted over the next two weeks to confirm if other treatment locations are available where Rocky Flats LDR waste can be treated sooner and more cost effectively for DOE. This assumes regional treatment centers will be allowable under the PEIS and that Rocky Flats waste may be shipped to these centers for treatment. I recommend that DOE revise the CTMP to commit to this course of action, rather than to commit to EPA that all the needed treatment capability will be built and operated at Rocky Flats for the next 30 or so years.

Reviewed for Addressee
Corres. Control RFP

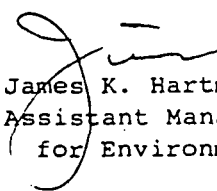
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DATE BY

ADMIN RECORD

A-SW-001249

I have discussed my concerns with Jill Lytle and Paul Longsworth of Clyde Frank's staff, and have requested my staff and EG&G to identify the actions needed to revise the CTMP before June 1, 1992 and to identify other preferred sites where the Rocky Flats waste could be treated. The proposed treatment technologies need not be changed, but the identification of any new facilities must satisfy NEPA requirements. RFO will initiate a conference call with our EM-30 and EM-50 contacts on May 11, 1992 at 1:30 (HQ time) to discuss this approach.


James K. Hartman
Assistant Manager
for Environmental Management

cc:

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J. Lytle, EM-30
C. Frank, EM-50
J. Schumann, EM-5
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